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21 **Pro hac vice application forthcoming*

22 *Attorneys for Defendant*
23 *MGM Resorts International*

24 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

25 RONALD G. RUNDELL, individually and on
26 behalf of all others similarly situated

27 Plaintiff,

Case No. 2:23-cv-01698

**STIPULATION TO EXTEND TIME
TO FILE DEFENDANT'S
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

28 STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S RESPONSE TO COMPLAINT
CASE NO. 2:23-CV-01698

v.

MGM RESORTS INTERNATIONAL,
Defendant.

Pursuant to LR IA 6-1, Plaintiff Ronald G. Rundell and Defendant MGM Resorts International (“MGM”) (collectively, the “Parties”) respectfully stipulate that MGM’s time to respond to the Complaint be extended from the current deadline of November 14, 2023, to and including December 12, 2023. This is the first stipulation for an extension of time to file MGM’s responsive pleading.

Good cause exists to enlarge the time for MGM to respond to the Complaint. Between September 21 and November 1, 2023, ten other related actions were filed against MGM in this and two other federal courts (the “Related Actions”). *See Owens v. MGM Resorts Int’l*, No. 2:23-cv-01480 (D. Nev.); *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537 (D. Nev.); *Kirwan v. MGM Resorts Int’l*, No. 2:23-cv-01481 (D. Nev.); *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550 (D. Nev.); *Terezo v. MGM Resorts Int’l*, No. 2:23-cv-01577 (D. Nev.); *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549 (D. Nev.); *Bezak v. MGM Resorts Int’l*, No. 2:23-cv-01719 (D. Nev.); *Zari v. MGM Resorts Int’l*, No. 2:23-cv-01777 (D. Nev.); *Albrigo v. MGM Resorts Int’l*, No. 3:23-cv-01797 (S.D. Cal.); *Lassoff v. MGM Resorts Int’l, et al.*, No. 1:23-cv-20419 (D.N.J.).

MGM’s counsel was only recently retained and requires additional time to review, investigate, and analyze the allegations in both the Complaint and the Related Actions. Moreover, based on the Parties’ current understanding of the claims, there are significant overlaps between this action and the Related Actions. As such, additional time is required to permit time to meet and confer with the various parties to the Related Actions, evaluate the potential consolidation of the cases, and conserve judicial resources.

The Parties’ request is made in good faith to enable MGM to complete an investigation into Plaintiff’s claims. Moreover, this case is in its infancy, and this request will not prejudice any party.

1 A proposed order is attached.

2 **WHEREAS** the Parties respectfully request that the Court extend MGM's time to
3 answer, move, or otherwise respond to the Complaint from November 14, 2023, to and
4 including December 12, 2023.

5
6 Dated: November 3, 2023

Respectfully submitted,

7
8 /s/ Nathan R. Ring

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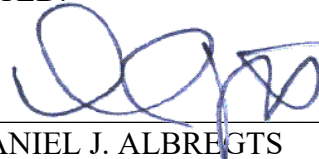
23 /s/ Todd L. Bice

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*Attorneys for Defendant
MGM Resorts International*

IT IS SO ORDERED that the parties' stipulation to extend time to file Defendant's response to complaint (ECF No. 8) is GRANTED.



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

DATED: 11/6/2023